

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

DANIEL KLEEBERG, LISA STEIN, and
AUDREY HAYS,

Plaintiffs,

v.

LESTER EBER; ALEXBAY, LLC f/k/a
LESTER EBER, LLC; ESTATE OF
ELLIOTT W. GUMAER, JR.; and WENDY
EBER,

Defendants,

and

EBER BROS. & CO., INC.; EBER BROS.
WINE AND LIQUOR CORP.; EBER
BROS. WINE & LIQUOR METRO, INC.;
EBER-CONNECTICUT, LLC; EBER-
RHODE ISLAND, LLC; EBER BROS.
ACQUISITION CORP.; EBER-METRO,
LLC; SLOCUM & SONS OF MAINE, INC.;
and CANANDAIGUA NATIONAL BANK
& TRUST COMPANY,

Nominal Defendants.

Civil Action No. 16-CV-9517(LAK)(KHP)

**NOTICE OF MOTION TO COMPEL
DEFENDANTS TO SUPPLEMENT
THEIR DISCOVERY RESPONSES**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum and Exhibits,
Plaintiffs, Daniel Kleeberg, Lisa Stein, and Audrey Hays, move this Court for an order
compelling Defendants Estate of Lester Eber; Eber-Connecticut, LLC; and Wendy Eber
(together, the “Defendant”) to supplement their discovery responses.

Dated: September 1, 2021

/s Brian C. Brook

Brian C. Brook (BB 1980)

Brook & Associates, PLLC

100 Church Street, 8th Floor

New York, New York 10007

Telephone: (212) 257-2334
Facsimile: (646) 257-2887
Brian@brook-law.com
*Attorneys for Plaintiffs Daniel Kleeberg, Lisa Stein,
and Audrey Hays*